

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BOARD OF TRUSTEES, etc.)
)
)
Plaintiff,)
) No. 07 C 6831
vs.) Judge Moran
) Magistrate Judge Ashman
ARROW PATTERN & FOUNDRY CO.,)
and JOHN KUCHAY,)
)
Defendants.)

AGREED MOTION FOR LEAVE TO FILE ANSWER
INSTANTER AND TO RESET STATUS DATE

Defendants, ARROW PATTERN & FOUNDRY CO., an Illinois corporation, and JOHN KUCHAY, by their undersigned counsel, hereby respectfully move – by agreement of counsel – that the Court grant them leave to file their answer to the amended complaint herein *instanter*, and that the status date set for Thursday, April 17, 2008, be reset until a later date when counsel has returned from a ten day vacation, in support of which defendants state:

1. Defense counsel is due to leave for a week's vacation tomorrow morning, April 17, 2008, which is his wife's spring vacation (she is a school teacher) and he therefore respectfully requests that the Court reset the status report, which had been continued until that date, until a later date after Monday, April 28, 2008, which will be his first day back at the office.

2. Defendants also ask leave to file their answer to the amended complaint *instanter*.

Counsel for both parties have been engaged in discussions in an effort to settle this case, and filing of the answer was postponed in hopes that the matter might have been resolved by now. Indeed, defendants still hope it may be resolved in short order as their latest offer to settle has been under advisement by plaintiffs for several days now.

WHEREFORE, defendants pray that the Court continue the status date set for April 17, 2008, until a date after April 28, 2008; that they have leave to file their answer *instanter*; and that they have all other relief to which they may be entitled.

/s/Thomas Brejcha
Attorney for defendants

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